



*Consulting Engineers
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March 9, 2006
(PBW Project No. 1259)

VIA ELECTRONIC MAIL

Mr. Gary Miller
Superfund Division, Region 6 (6SF-AP)
Arkansas/Texas Section
U.S. Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: February 2006 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the modified Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) (collectively referred to as Respondents in the UAO). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15th of the following month as required in Paragraph 53 of the UAO, rather than by the 10th of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
 - Submittal of Final RI/FS Work Plan (SOW Paragraph 18) – meeting held with EPA, TCEQ and natural resource trustees on February 8, 2006 to discuss comments and proposed responses regarding the Draft RI/FS Work Plan (comments were received on January 24, 2006), follow-up meeting held with TCEQ on February 15.
 - Submittal of Final RI/FS SAP (SOW Paragraph 26) – meeting held with EPA, TCEQ and natural resource trustees on February 8, 2006 to discuss comments and proposed responses regarding the Draft RI/FS SAP (comments were received on January 24, 2006), follow-up meeting held with TCEQ on February 15.
 - Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) and west of the Site (relative to Site property south of Marlin Avenue) (UAO Paragraph 72) – ongoing discussion with owners of properties for which access is needed.

2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
 - Acquisition of access to properties immediately adjacent to the north and northeast of the Site (relative to Site property north of Marlin Avenue) and west of the Site (relative to Site property south of Marlin Avenue) (UAO Paragraph 72) – to be completed by March 31, 2006 (per January 30, 2006 extension request).
 - Submittal of Final RI/FS Work Plan (SOW Paragraph 18) – to be submitted by March 15, 2006 (per February 10, 2006 extension request).
 - Submittal of Final RI/FS SAP (SOW Paragraph 26) – to be submitted by March 15, 2006 (per February 10, 2006 extension request).
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – The scope of activities to be performed as part of the RI/FS is described in the RI/FS Work Plan. Until that work plan has been approved by EPA, it is not possible to estimate a percentage completion for the project.

Thank you for the opportunity to submit this status report. Should you have any questions, do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.
Principal Engineer

cc: Mr. Brent Murray - Sequa Corporation
Mr. Rob Rouse - The Dow Chemical Company
Mr. Allen Daniels - LDL Coastal Limited, LP
Mr. F. William Mahley - Strasburger & Price, LLP
Mr. James C. Morris III - Thompson & Knight, LLP
Ms. Elizabeth Webb - Thompson & Knight, LLP